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June 11, 2008

By ECF and Facsimile

The Honorable Naomi Reice Buchwald  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

RE: *In re LIBOR-Based Financial Instruments Antitrust Litigation*, 11-MD-2262 (NRB)

Dear Judge Buchwald:

We write on behalf of Direct Action Plaintiffs ("DAPs") in response to Defendants' letter dated June 7, 2018, regarding discovery issues. ECF No. 2535.

As stated in Plaintiffs' May 25, 2018 letter (ECF No. 2528), DAPs agree that issues raised with "Group 2" and "Group 1" Defendants on issues specific to DAPs are not ripe for this Court's review. Consistent with Defendants' request that the parties meet-and-confer on a Defendant-by-Defendant basis, DAPs have in the past two weeks corresponded with each Defendant against which we have live claims, participated in three telephonic meet-and-confers, and are in the process of scheduling four more telephonic conferences for next week. DAPs liaison counsel is identifying on these calls the non-stayed DAPs on whose behalf liaison counsel speaks. DAPs expect the parties will continue to negotiate in good faith over the next several weeks. In the event the parties require the Court's involvement with DAP-specific issues, we will raise those issues at the appropriate time.

Sincerely,

/s/ James R. Martin  
James R. Martin  
*Direct Action Plaintiffs Liaison Counsel*

cc: All Counsel (via ECF)